

RULE 16 CONFERENCE CHECKLIST

Instructions: Fill in the left-hand (“Parties’ Proposal”) column with your suggested dates. Leave the right-hand column (“Suggested Dates”) blank; court staff will make any necessary changes before giving this checklist to Judge Immergut. Please double-check to make sure your proposed dates do not fall on weekends or court holidays. Pretrial conferences must be scheduled on a **Thursday** and take place at 10AM unless the Court orders otherwise. Civil trials must begin on a **Tuesday**. In addition to filing this checklist on CM/ECF as an exhibit to your Rule 26 submission, email a **Word version** to Jacob_Yerke@ord.uscourts.gov.

If expert discovery will not be conducted separately, enter “Not Applicable” in the expert discovery fields. Do not add additional time between the close of discovery and the statement of agreed and disputed facts.

Note: Any motion for extension must be filed at least seven (7) days before the relevant deadline.

Case Name: Carol Funk v. Oregon Health and Science University

Case No.: 3:23-cv-01260-IM

Date Filed: August 28, 2023

Plaintiffs’ Atty.: Caroline Janzen (Janzen Legal Services, LLC)

Defendants’ Atty.: Brenda Baumgart and Sophie Shaddy-Farnsworth (Stoel Rives)

Basis for Federal Subject-Matter Jurisdiction: Federal Question

	Parties’ Proposal	Suggested Date
Amend Pleadings/Join Parties	April 30, 2024	
+ 30 days		
Motions to Compel [Fact/All] Discovery	May 30, 2024	
+ 7 days		
- Response due (no replies permitted)		[7 days after motion to compel is filed]
+ 14 days		
Complete [Fact/All] Discovery	June 20, 2024	
+ 21 days		
Initial Expert Disclosures	July 11, 2024 *At the Rule 16 conference, the parties would like to propose phasing expert disclosures in the event the case proceeds to trial.	
+ 30 days		

<i>Rebuttal Expert Disclosures</i>	August 12, 2024	
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+ 7 days

<i>Motions to Compel Expert Discovery</i>	August 19, 2024	
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+ 7 days

- <i>Response due (no replies permitted)</i>		[7 days after motion to compel is filed]
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+ 14 days

<i>Complete Expert Discovery</i>	September 9, 2024	
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+ 14 days

Statement of Agreed and Disputed Facts	September 23, 2024	
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+ 14 days

Joint ADR Report (<i>same date as Dispositive Motion</i>)	October 7, 2024	
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Dispositive Motions (<i>same date as Joint ADR Report</i>)	October 7, 2024	
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+ 150 days

Pretrial Order and Verdict Form	March 6, 2025	
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+ 7 days

Trial Documents filed <i>by Noon</i>	March 13, 2025	
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+ 21 days

Pretrial Conference (Thursdays)	April 3, 2025	
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+ 14 days

Jury Trial (# of days: 5) (Tuesdays)	April 17, 2025	
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